### IN THE UNITED STATES BANKRUPTCY COURT OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

JAY P. ACKERMAN : CASE NO. 1:20-bk-03076 HWV

BRENDA M. ACKERMAN :

Debtors : CHAPTER 13

# SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN

AND NOW comes Debtors, Jay P. Ackerman and Brenda M. Ackerman, by and through their attorney, Gary J. Imblum and respectfully represents:

- 1. Debtors filed a Chapter 13 Bankruptcy to the above term and number on October 20, 2020.
  - 2. Debtors filed the bankruptcy as an emergency filing due to a pending lawsuit.
- 3. Debtors' counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing.
- 4. A Motion for Extension of Time was filed on November 2, 2020 which was approved by an Order dated November 10, 2020.
  - 5. Debtors' schedules are due to the Court on or before December 3, 2020.

6. It is estimated that Debtors' counsel will need an additional 30 days in order to

file the bankruptcy schedules and Plan.

WHEREFORE, Debtors respectfully requests that this Honorable Court issue an Order

extending the deadline for Debtors to file bankruptcy schedules and plan until January 2,

2021.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.

Gary J. Imblum

Attorney Id. No. 42606

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Email: gary.imblum@imblumlaw.com

**Attorney for Debtors** 

Dated: December 3, 2020

#### **CERTIFICATE OF SERVICE**

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

CHARLES J DEHART III ESQUIRE CHAPTER 13 TRUSTEE VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Bernadette Davis
Bernadette A. Davis, Paralegal
4615 Derry Street
Harrisburg PA 17111
717 238-5250

Fax No. 717 558-8990

Email: gary.imblum@imblumlaw.com

Dated: December 3, 2020

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#### **ORDER**

Upon consideration of Debtors' Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned pleadings in the above captioned case is extended through January 3, 2021.